

✓ FILED \_\_\_\_\_ RECEIVED \_\_\_\_\_  
ENTERED \_\_\_\_\_ SERVED ON \_\_\_\_\_  
COUNSEL/PARTIES OF RECORD

**SEP 26 2019**

CLERK US DISTRICT COURT  
DISTRICT OF NEVADA

BY: \_\_\_\_\_ DEPUTY

1 Robert C. Ryan (#7164)  
2 Timothy A. Lukas (#4678)  
3 HOLLAND & HART LLP  
4 5441 Kietzke Lane, Second Floor  
5 Reno, Nevada 89511  
6 Phone: (775) 327-3042  
7 Fax: (775) 786-6179  
8 rccryan@hollandhart.com  
9 tlukas@hollandhart.com

6 Christopher B. Hadley  
(Admitted *pro hac vice*)  
7 JONES, WALDO, HOLBROOK & McDONOUGH, PC  
8 1441 West Ute Blvd., Suite 330  
9 Park City, Utah 84098  
10 Telephone: (435) 200-0087  
11 Facsimile: (435) 200-0084  
12 chadley@joneswaldo.com

13 *Attorneys for Plaintiff and Counter Defendants*

14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 CHEMEON SURFACE TECHNOLOGY, LLC, a  
17 Nevada limited liability company,

18 Plaintiff,

19 v.

20 METALAST INTERNATIONAL, INC., a Nevada  
21 corporation; METALAST, INC., a Nevada  
22 corporation; SIERRA DORADO, INC., a Nevada  
23 corporation; DAVID M. SEMAS, an individual;  
24 GREG D. SEMAS, an individual; and WENDI  
25 SEMAS-FAURIA, an individual.

26 Defendants.

27 DAVID M. SEMAS; and METALAST  
28 INTERNATIONAL, INC.,

Counterclaimants,

v.

CHEMEON SURFACE TECHNOLOGY, LLC,  
DEAN S. MEILING; and MADYLON  
MEILING,

Counter Defendants.

Case No.: 3:15-cv-00294-MMD-CBC

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO FILE  
RESPONSE TO DEFENDANT'S  
MOTION FOR LEAVE TO FILE NEW  
DISPOSITIVE MOTIONS**

**[FIRST REQUEST]**

HOLLAND & HART LLP  
5441 Kietzke Lane, 2nd Floor  
Reno, NV 89511  
Phone: (775) 327-3000 ♦ Fax: (775) 786-6179

1 Plaintiff and Counter Defendants, by and through their undersigned counsel, Timothy A.  
2 Lukas of Holland & Hart, LLP; and Defendant and Counterclaimant, by and through his undersigned  
3 counsel, Michael D. Hoy of Hoy Chrissinger Kimmel Vallas, PC, stipulate and agree as follows:

4 1. On September 11, 2019, Defendant and Counterclaimant filed his Motion for Leave  
5 to File New Dispositive Motions (ECF No. 511).

6 2. Pursuant to Local Rule 7-2(b), Plaintiff and Counter Defendants' response to the  
7 Motion for Leave is due on September 25, 2019.

8 3. The parties hereby stipulate to extend the deadline for Plaintiff and Counter  
9 Defendants to respond to the Motion for Leave until Monday, September 30, 2019. Based on the  
10 drafting of additional briefs requested by the Court on other issues and the need to research  
11 additional legal issues related to the Motion for Leave, Plaintiff and Counter Defendants' counsel  
12 requested an additional five days to file their response to the Motion for Leave and Defendant  
13 Counterclaimant's counsel agreed to the request.

14  
15  
16  
17  
18  
19  
20  
21  
22 ///

23  
24  
25 ///

26  
27  
28 ///

**HOLLAND & HART LLP**  
5441 Kietzke Lane, 2nd Floor  
Reno, NV 89511  
Phone: (775) 327-3000 ♦ Fax: (775) 786-6179

1           4. Pursuant to LR 6-1, this first request for an extension is made with good cause and  
2 in good faith and not for purposes of delay. This is the Parties' first request for an extension of time  
3 to file a response to the Motion for Leave. Counsel do not believe that the extension requested would  
4 cause any undue delay in this case.

5           IT IS SO STIPULATED.

6           DATED this 25th day of September, 2019.

          DATED this 25th day of September, 2019.

7           HOLLAND & HART LLP

          HOY CHRISSINGER KIMMEL PC

8           /s/ Timothy A. Lukas  
9           Robert C. Ryan (7164)  
10          Timothy A. Lukas (#4678)  
          5441 Kietzke Lane, Second Floor  
          Reno, Nevada 89511

/s/ Michael D. Hoy  
          Michael D. Hoy (2723)  
          Bank of America Tower  
          50 West Liberty Street, Suite 840  
          Reno, Nevada 89501

11          Attorneys for Chemeon Surface Technology  
12          and Dean S. Meiling and Madylon Meiling

          Attorneys for Defendants and  
          Counterclaimants

13          No further  
14          extensions will  
15          be granted.

16          IT IS SO ORDERED.

17          United States Magistrate Judge  
18          DATED: 9/26/2019

HOLLAND & HART LLP  
5441 Kietzke Lane, 2nd Floor  
Reno, NV 89511  
Phone: (775) 327-3000 ♦ Fax: (775) 786-6179